



U.S. Department of Justice

*United States Attorney
Southern District of New York*

MEMO ENDORSE

50 Main Street, Suite 1100
White Plains, New York 10606

January 24, 2023

BY CM/ECF

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: *United States v. Almighty Ward, et al.*, 22 Cr. 47 (KMK)

Dear Judge Karas:

The Government respectfully writes, with the consent of the defendants, to request an adjournment of the next pretrial conference in this matter, currently scheduled for February 3, 2023.

As the Court is aware, the parties were last before the Court on June 16, 2022 for a pretrial conference. Since that appearance, the Government has produced all of the Rule 16 discovery in its possession and has discussed potential pretrial resolutions with the defendants. Additionally, on December 14, 2022, Justice Jackson, Tyrell Simon, and Markell Williams were arraigned on racketeering and other charges in a separate indictment, *United States v. Jeremy Williams, et al.*, 22 Cr. 641 (PMH). The next scheduled conference in *Williams* is on April 21, 2023. Based on the above, the parties believe that an adjournment of the next pretrial conference until after the *Williams* status conference in April, to be scheduled at the Court's discretion, will serve the ends of justice and conserve judicial resources as the parties continue to review discovery in the above-referenced case and in *Williams*, and discuss potential pretrial resolutions in both cases.

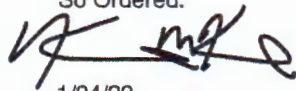
Should the Court grant the adjournment, the Government further respectfully requests, without objection from the defendants, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from February 3, 2023 through the date of the rescheduled pretrial conference. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial because it would allow (i)

defense counsel time to continue reviewing discovery; and (ii) continued discussions regarding potential pretrial resolutions.

Accordingly, the Government respectfully encloses a proposed order excluding time.

Granted. The conference is adjourned to
5/4/23, at 2:00

So Ordered.


1/24/23

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: _____/s/_____

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cc: Counsel of Record (by CM/ECF)